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Injunction—Boycott by Labor Organization—Vender of Materials.

—There is a conflict of opinion among the courts as to the right of members of a labor union to agree not to handle the product of an employer of labor, without reference to whether the purpose or end sought thereby to be attained is justifiable. That members of a labor union may be enjoined from refusing to handle materials sold by one who furnishes supplies to an employer of non-union labor, if they have no dispute with their employers who purchase such materials, is held in the Massachusetts case of *Burnham v. Dowd*, 217 Mass. 351, 104 N. E. 841, annotated in 51 L. R. A. (N. S.) 778.

Electrocution of Murderers.—The act of the South Carolina legislature changing the death penalty from hanging to electrocution, and providing for an increased number of witnesses, is constitutional according to the opinion in *Joe Malloy v. State of South Carolina*, 35 Supreme Court Reporter, 507: "The constitutional inhibition of ex post facto laws was intended to secure substantial personal rights against arbitrary and oppressive legislative action, and not to obstruct mere alteration in conditions deemed necessary for the orderly infliction of humane punishment. The contention in behalf of plaintiff in error most earnestly relied on is this: Any statute enacted subsequent to the commission of a crime which undertakes to change the punishment therefor is ex post facto and unconstitutional unless it distinctly modifies the severity of the former penalty. The courts cannot and will not undertake to say whether or not a change from hanging to electrocution is an increase or mitigation of punishment, and therefore the act of 1912 cannot apply in the circumstances presented here." "The statute under consideration did not change the penalty—death—for murder, but only the mode of producing this, together with certain nonessential details in respect of surroundings. The punishment was not increased, and some of the odious features incident to the old method were abated."